



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SK/RCH/EMR/PP/MD
F. #2019R00927

*271 Cadman Plaza East
Brooklyn, New York 11201*

July 14, 2022

By ECF

The Honorable Brian M. Cogan
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Genaro Garcia Luna
Criminal Docket No. 19-576 (BMC)

Dear Judge Cogan:

The government respectfully submits this written status update to the Court in the above-captioned matter, in advance of the upcoming status conference scheduled for July 15, 2022. At the conference, the government will request that an order of excludable delay is appropriate based on the Court's previous complex case designation in this matter, the pendency of the government's pretrial motions, and the need for defense counsel to prepare for trial, which is scheduled for October 24, 2022.

The government respectfully writes to update the Court on the following issues:

- The government has produced the vast majority of the discoverable material currently in its possession. To the extent that the government receives additional discoverable materials, the government will continue to make productions to the defense on a rolling basis.
- The government has produced material pursuant to 18 USC § 3500 for 15 potential law enforcement witnesses and two potential cooperating witnesses. The government will continue its rolling production of § 3500 material in advance of trial and will provide all such material by the Court's deadline of September 23, 2022.

- Trial in this case is scheduled for October 24, 2022. At the upcoming status conference, the government seeks to set a schedule for the submission of a jointly proposed juror questionnaire and the expected timing of jury selection.

Respectfully submitted,

BREON PEACE
United States Attorney

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cc: Cesar de Castro, Esq.
Clerk of the Court (BMC) (by ECF)